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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	
	§	Case No. 21-31488-sgj11V
WATTSTOCK, LLC,	§	
	§	Chapter 11
Debtor.	§	Subchapter V
	§	
WATTSTOCK, LLC, Plaintiff,	§	Adv. No. 21-3083
	§	
v.	§	<i>Removed from the District Court</i>
	§	<i>of Dallas County, Texas,</i>
ALTA POWER LLC, Defendant, Counter-Plaintiff,	§	<i>116th Judicial District</i>
and Third-Party Plaintiff,	§	
	§	<i>Cause No. DC-20-08331</i>
v.	§	
	§	
WATTSTOCK, LLC, Counter-Defendant, and	§	
	§	
GENERAL ELECTRIC INTERNATIONAL, INC.,	§	
d/b/a GE POWER SERVICES, Third-Party	§	
Defendant.	§	

AGREED MOTION TO MODIFY SCHEDULING ORDER

Pursuant to Federal Rule of Civil Procedure 16(b), made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 7016, the Parties hereby respectfully move the Court to modify the Scheduling Order entered by the Court August 16, 2022. Dkt. 51.

The Parties seek to modify the scheduling order to allow for additional time to complete fact discovery, including party and third-party depositions. The Parties have conferred about the case schedule, and as a result of those discussions, the Parties jointly propose the following modified scheduling order.

Event	Deadline
Deadline for Parties to Serve Initial Disclosures	August 11, 2022
Deadline for Completion of Fact Discovery	December 16, 2022
Deadline for Production of Expert Reports for the Party With Burden of Proof	December 21, 2022
Deadline for Production of Opposing Expert Reports	February 22, 2023
Deadline for Production of Rebuttal Expert Reports	March 20, 2023
Deadline for Completion of Expert Discovery	April 7, 2023
Deadline to Complete Mediation with Agreed-Upon Neutral Mediator	April 14, 2023
Deadline for Summary Judgment Motions	May 1, 2023
Deadline for Oppositions to Summary Judgment Motions	Thirty days after a Summary Judgment Motion is filed
Deadline for Reply Briefs in Support of Summary Judgment Motions	Twenty-one days after an Opposition to a Summary Judgment Motion is filed
Deadline for <i>Daubert</i> Motions	June 30, 2023
Deadline for Oppositions to <i>Daubert</i> Motions	Twenty-one days after a <i>Daubert</i> Motion is filed
Deadline for Reply Briefs in Support of <i>Daubert</i> Motions	Fourteen days after an Opposition to a <i>Daubert</i> Motion is filed
Hearing regarding (i) outstanding motions, if any; and (ii) whether case is ready for trial at district court	August 30, 2023

Accordingly, the Parties jointly and respectfully request entry of a scheduling order consistent with these dates.

Dated: September 29, 2022

By: /s/ Thomas Berghman

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand _____

Andrew LeGrand

*Attorney for General Electric
International, Inc.*